



STATE OF MISSISSIPPI  
DEPARTMENT OF AGRICULTURE AND COMMERCE  
CINDY HYDE-SMITH  
COMMISSIONER

December 15, 2017

Tawanda Maignan  
Emergency Response Team Leader  
Risk Integration, Minor Use, and Emergency Response Branch  
Registration Division I  
U.S. EPA Office of Pesticide Programs

Dear Ms. Maignan:

The Mississippi Department of Agriculture and Commerce hereby submits a recertification request for the specific exemption granted for the use of sulfoxaflor (Transform® WG Insecticide) to control sugarcane aphid in sorghum crops in Mississippi. According to the authorization letter for 17MS02, this exemption is eligible for streamlined review, as the emergency condition still exists.

Also, I would certify that the information in our previous submission is still accurate. The only change would be to please replace Don Christy as a contact person with myself, Michael Ledlow. The phone number to reach me remains unchanged, and my email is [MichaelL1@mdac.ms.gov](mailto:MichaelL1@mdac.ms.gov). The requested chemical sulfoxaflor will be used in identical manner as was previously requested and granted, including rate and method. There have been no new effective control measures for this pest introduced since the previous request.

If you should have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Ledlow".

Michael Ledlow  
Director



Department of Entomology and Plant Pathology

December 20, 2017

To whom it may concern:

In July of 2013 the state of Louisiana discovered a new species of aphid in grain sorghum not previously noted in the mid-southern region to be a pest of grain sorghum. On further examination it was identified as sugarcane aphid, *Melanaphis sacchari*.

In 2017 Mississippi producers planted nearly 10K acres of grain sorghum. Although only one county (Bolivar) reported sugarcane aphids in 2013, every county with grain sorghum planted since that time has the pest present above economic threshold. Entomologist in MS conducted several trials during 2014-16 to determine potential yield loss from this invasive pest. Yield losses ranged from 21-100% depending on infestation timing and duration. The Mississippi State University Extension Service have witnessed numerous producer fields that suffered severe economic loss.

The capacity of this pest to spread through the landscape and infest new areas is astonishing. We fully anticipate having to deal with this pest in 2018. The emergency exemption granted in 2017 in the state of Mississippi prevented catastrophic levels of loss by grain sorghum producers.

Sorghum breeders are currently working on resistant lines and cultural practices such as planting date and plant populations are currently being evaluated. However, there are no proven management options other than incorporating multiple insecticide modes of action until host plant resistance is incorporated into commercial varieties and cultural methods are validated.

The data provided in the submitted Section 18 in 2017 clearly demonstrates that yield loss from this pest greatly exceeds 20% of gross revenue. Currently there is only one alternative product on the market and there is the potential for exposure due to gaps in the timeline where the label does not allow sequential application, PHI, or simply there may be more seasonal exposure than the maximum number of seasonal applications allowed.



Department of Entomology and Plant Pathology

Transform provides a high level of efficacy and yield protection against sugarcane aphids, preserves beneficial insect populations. Mississippi received Transform in 2017 for use against sugarcane aphids through a Section 18 emergency exemption and the product was used successfully with no adverse effects to the environment or local beekeepers. This indicates that farmers have demonstrated that this product can be used in accordance to labeled directions to manage sugarcane aphids in a sustainable manner.

We certify that the conditions set forth in 2017 will remain consistent with expectations for the 2018 growing season and are identical in nature. We are not aware of new or alternative management strategies that are different than in the preceding year. We respectfully ask that EPA consider granting the exemption of Transform for the use year of 2018 described in the same manner as the previous submission for use in 2017.

Thank you.

Sincerely,

A handwritten signature in dark ink that reads "Angus Catchot". The signature is fluid and cursive, with the first name "Angus" and last name "Catchot" clearly distinguishable.

Angus Catchot, Extension Entomologist-MSU-ES



**Dow AgroSciences**

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**Dow AgroSciences LLC**

9330 Zionsville Road  
Indianapolis, IN 46163

**dowagro.com**

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December 4, 2017

Jasper Cobb  
Mississippi Department of Agriculture and Commerce  
Bureau of Plant Industry  
P.O. Box 5207  
Mississippi State, MS 39762

Re: Support letter for Transform™ WG Section 18 on sorghum

Dear Mr. Cobb,

Per your request, this letter is to confirm that Dow AgroSciences supports the pursuit of a Section 18 emergency exemption for Transform WG to control sugarcane aphid in sorghum in the state of Mississippi. Transform WG has provided excellent efficacy against plant bugs in previous use under Section 18 exemptions, with no negative impacts on non-target insects. It represents a new class of chemistry with a novel mode of action, and controls pests resistant to other classes of chemistry.

If you have questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamey Thomas".

Jamey Thomas, Ph.D.  
US Regulatory Manager  
Dow AgroSciences

cc: Tami Jones-Jefferson, DAS

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# Transform<sup>®</sup> WG

## Registration Notes:

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Dow AgroSciences

Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

## Transform<sup>®</sup> WG

For Control of Sugarcane Aphid (*Melanaphis sacchari*) in Sorghum

Section 18 Emergency Exemption

File symbol: XXXXXX

FOR DISTRIBUTION AND USE ONLY IN MISSISSIPPI UNDER SECTION 18 EMERGENCY  
EXEMPTION

This Section 18 Emergency Exemption is effective XXXXXX and expires XXXXXX.

- This labeling must be in the possession of the user at the time of application.
- It is in violation of federal law to use this product in a manner inconsistent with its labeling.
- Read the label affixed to the container for Transform<sup>®</sup> WG insecticide before applying. Carefully follow all precautionary statements and applicable use directions.
- Any adverse effects resulting from the use of Transform WG under this emergency exemption must be immediately reported to the Mississippi Department of Agriculture

### Directions for Use

#### Pests and Application Rates:

Pests	Transform WG (oz/acre)	Comments
Sugarcane aphid	0.75 – 1.5 (0.023 – 0.047 lb ai/acre)	Use a higher rate in the rate range for heavy pest populations.

**Application Timing:** Treat in accordance with local economic thresholds. Consult your Dow AgroSciences representative, cooperative extension service, certified crop advisor or state agricultural experiment station for any additional local use recommendations for your area.

**Application Method:** Control of sugarcane aphid may be contingent on thorough coverage to the crop. Use sufficient water to get full coverage of the canopy. It is recommended that a minimum of 5 gallons of water be applied by air.

#### Restrictions:

- **Preharvest Interval:** Do not apply within 14 days of grain or straw harvest or within 7 days of grazing, or forage, fodder, or hay harvest.
- A restricted entry interval (REI) of 24 hours must be observed.
- Do not make more than two applications per acre per year.
- **Minimum Treatment Interval:** Do not make applications less than 14 days apart.
- Do not apply more than a total of 3.0 oz of Transform WG (0.09 lb ai of sulfoxaflor) per acre per year.
- Do not apply product  $\leq$  3 days pre-bloom or until after seed set.

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R396-118

Approved: \_\_/\_\_/\_\_

Replaces 396-091